Before
Federal Communications Commission
Washington, D.C. 20055

In the Matter of   )
Report on Rural   )   GN Docket No. 09-29
Broadband Strategy   )

To the Full Commission:

Comments of
Alphastar International

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March 25, 2009

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To the Full Commission:

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   AlphaStar International (www.alphastar.com), through counsel, respectfully responds to the Federal Communications Commission request for input on a how it should coordinate with the Department of Agriculture/ Rural Utility Service (RUS) to implement section 6112 of the American Recovery and Reinvestment Act of 2009, Pub. L. No. 111-5, 123 Stat. 115 (2209) (Recovery Act). Alphastar is commenting for the limited purpose of presenting the perspective of a small disadvantaged business. AlphaStar is eager to participate and urges the FCC to work with RUS to implement procedures, policies and rules that will encourage and enable small businesses to compete and receive funding or loans under the program.

It is no secret that historically, small, minority and women-run businesses have had substantially difficult time acquiring valuable wireless spectrum and obtaining the resources necessary to operate the type of technology companies that will be able to advance the rural broadband agenda being promoted by the Recovery Act. To that end, this initiative represents a significant opportunity for many small businesses. It is very important that the policies, rules and procedures adopted in the roll out do not create any artificial barriers to small businesses' ability to apply and be awarded grants and loans. `

   AlphaStar is a small business but it is big in agility, creativity and cost affordability. AlphaStar is proposing to launch a hybrid IP model of terrestrial broadband with a satellite backhaul that will enable third party service providers to offer high speed

internet access and other interment applications to un-served and underserved areas anywhere in America.

Although the extensive roll-out of an enhanced version of its proposed model will be pending on the receipt of grant and/or loan funding, AlphaStar has already had the opportunity to develop early permeations of this technology and to conduct test runs of its capabilities. In early 2000, Alphastar created an internet broadband network integrating two-way satellite and wireless local access. The test run was conducted using Cisco System's wireless technology.[1] Shortly thereafter, Alphastar used the technology to offer broadband service in sixteen locations. Unfortunately, AlphaStar could not secure the necessary funding to expand beyond the initial market notwithstanding the fact that it had created a scalable and creative model. Nine years after Alphastar tested this IP terrestrial/satellite model and rolled out satellite broadband, an international summit on internet satellite will be exporing that very hybrid

Alphastar is looking to apply for funding through RUS to compete and immediately to once again offer services to rural, unserved and underserved markets. To start the process of upgrading its current facilities, test and launch the satellite broadband backbone, it would need to employ hundreds within months of receiving money which would immediately stimulate parts of the economy and create jobs, contributing to the goals of President Obama's administration and as envisioned by the Broadband Stimulus bill. The broadband service will be also affordable given the business model adopted by AlphaStar and the IP hybrid model. AlphaStar's deployment will be parallel to the launch of services as with satellite within one to two hours of a dish being installed, service can be delivered to hundreds of broadband users in areas that are not reachable by fiber or too costly in terms of money and time to get there. AlphaStar does not need to wait to dig ditches nor does it need to build or launch satellites. AlphaStar's business model is based on leasing capacity from satellite companies on an as needed basis and gradual basis.

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[1] AlphaStar Demonstrates A Broadband Network Integrating Two-way Satellite with Cisco Wireless Technology, Alphastar Press Release, June 5, 2000 (http://www.alphastar.com/press_releases/press_rel_06_05_00.html)

Alphastar Launches High Speed Internet Access Service, Space News Feed, (http://www.spacenewsfeed.co.uk/2001/2001/10June2001.html), (June 10, 2001) (discussing how Alphasar's service SkyCrossing,provided direct bi-directional satellite broadband access to commercial and institutional users allows Internet access at speeds up to 33 mega bits per second.

The company plans to lease capacity on Ku, C, Ka and L Band satellites. This strategy would allow AlphaStar to be a cost effective medium that eliminates expensive overhead costs. Given such savings, AlphaStar will be able to pass along the lower cost of delivering broadband services to its clients and ultimately the end users in rural and remote areas. If awarded a license, AlphaStar is looking to be able to contribute to affordable broadband access for rural, unserved and underserved consumers.

The U.S. government built AlphaStar's, Teleport in the early 1980s as part of President Reagan's **Star Wars** initiative. The company has been able to contain costs by using the satellite primarily for the backhaul of Internet bandwidth. AlphaStar is hoping to once again use its satellite bandwidth to, for example relay terrestrial WiMAX transmitters or supply Metro WiFi systems. When entirely built out, the system could be used for mobile and maritime applications as well as Disaster Recovery and homeland security purposes. In the new digital age, there are new alternatives also for transmission. Instead of two-way satellite receiver at customer locations, the system can utilize smart phones, mobile internet devices and low cost radios. Alphastar is looking to use the funding, if received, to build an enhanced satellite broadband backbone capable of delivering video and audio streaming. It will cache the AV streams and large portions of the internet locally at the WiMAX transmitter performance is dramatically improved at affordable cost.

AlphaStar has already contacted and planned partnerships with wireless networks, rural Telcos and cable TV system to integrate the IP based model of AlphaStar with their networks. At this time AlphaStar and partners can provide broadband services in ten states.[2] AlphaStar is still seeking additional partnership with ISPs, municipalities, nonprofit organizations, government agencies and Native American communities among others.

Given its proposed, planned and already launched plans, AlphaStar is relying on the Commission to lend its expertise, experience, resources, institutional history and

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[2] A Hybrid Rural Delivery Network for Broadband Stimulus AlphaStar(R) & CTC Build Unique WiMAX 4G System, Press Release of AlphaStar International Inc. and Computers & Tele-Comm, Inc., released March 12, 2009 (http://www.reuters.com/article/pressRelease/idUS125973+12-Mar-2009+PRN20090312)

record on broadband to RUS and to freely offer its advice to make sure that the loan and grant funding is implemented in an open and transparent fashion. More specifically, AlphaStar suggests that the FCC work with the RUS to enact rules and processes that will protect small cap entities, whether previously or formally certified as a small disadvantaged business. It is imperative that the new entrants and companies that are tinkering on the verge of technological breakthroughs simply needed adequate capitalization to push them over are given the opportunity to fairy compete and receive funding.

Alphastar is relying on the FCC to put its background in regulating communications industries to use and ensure that the funding, when deployed, is awarded amply to small businesses.

Respectfully submitted,

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A Hybrid Rural Delivery Network for Broadband Stimulus AlphaStar(R) & CTC Build Unique WiMAX 4G System

(Website)

INDEPENDENCE, Mo., March 12 /PRNewswire/ -- AlphaStar International, Inc. and Computers & Tele-Comm, Inc., (CTC) announced today a unique joint venture to provide very high speed WiMAX 4G services for any area anywhere across the entire USA. According to CTC President, Graeme Gibson, "*The Digital Divide* just got smaller. Today with this announcement, rural areas with no access to broadband fiber finally have a solution to getting connected at 4G speeds. Our mutually developed hybrid model takes advantage of the AlphaStar Teleport, a facility originally built by the U.S. government as part of President Reagan's **Star Wars** initiative. AlphaStar (tour) can track any area of the USA including Hawaii and US territories to deliver true 4G speeds. Costs are contained by using the satellite primarily for the backhaul of Internet bandwidth." Bandwidth is then relayed by ground based WiMAX transmitters although the system can also serve to supply Metro WiFi systems or be used for mobile and maritime applications as well as Disaster Recovery and homeland security purposes. Low cost radios can be used rather than a two-way satellite receiver at customer locations. The Teleport can also deliver video and audio streaming. By caching the AV streams and large portions of the internet locally at the WiMAX transmitter performance is dramatically improved at affordable cost.

President Obama approved over $7 billion to foster rural and accelerated urban broadband infrastructure. Gibson continued, "By partnering with AlphaStar, we can build complex projects in areas that nothing else can reach. The intent of Congress was to make broadband access available to the rural United States regardless of population densities and economic feasibility. This system marries the *go anywhere* capability of direct broadcast satellite backhaul with CTC's low cost WiMAX distribution of services on the ground, a perfect marriage for fast deployment and building bridges over the digital divide." The partnership will help local government, companies, and organizations applying for grants and loans from the stimulus to make their funding go much further. **John Wahba** of AlphaStar pointed out "The hybrid model can be deployed within weeks to months (depending on scope), serves underserved and unserved areas, and offers immediate employment as intended by the legislation. The model is scalable and allows other rural ISP's to join the effort including wireless, rural Telco's and cable companies and we welcome them to our partnership."

Organizations and groups can now download the CTC authored Rural Reference Model. This model will help operators in their planning and budgeting process as it supplies baseline references, technical capability, and integration with other systems. Gibson added: "Our approach is quite broad; we intend to be able to invite many projects and

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Cutting the Tie that Binds

TeleCrossing.net is launching a hybrid satellite/fixed wireless solution that bypasses all wireline connections and should sell to consumers for about the same as basic DSL. The company is looking for ISP partners.

by Gerry Blackwell
[October 20, 2000]

Email this article to a colleague

One of the nice advantages of using fixed wireless for broadband access if you're an ISP is that it gets you away from reselling DSL services from the local exchange carrier (LEC), who also just happens to be your competitor.

Trouble is, you likely still have to deal with the LEC or some other giant wireline telecom entity, also a competitor, to get a connection to the Internet backbone.

But now there's a company that promises to cut ISPs free forever from the wireline carriers and all their hassles and competitive conflicts.

Greenwhich CT-based TeleCrossing.net, a reincarnation of Alphastar International, the defunct DTH (direct-to-home) satellite broadcaster, is using a hybrid satellite and fixed wireless system to deliver end-to-end, wire-free high-speed Internet service.

Founder and president Mahmoud Wahba claims the company's hybrid system

provides the bandwidth of fiber and will be
more reliable and accessible than DSL or
cable. It can also make use of multicasting
technology to enable high-quality streaming
media services.

Undividing the disenfranchised
TeleCrossing is targeting "Internet and
intranet users who are unserved,
underserved, dissatisfied with cable and
DSL or among the disenfranchised who fall
in the digital divide."

Unlike some other satellite-based Internet
services, this one is two-way, though
asymmetrical---that is, there's more
bandwidth coming down to the customer
site than going back up to the Net.

The first satellite-based services required—
still require—subscribers to use a phone
line for the uplink.

Service range
The entry-level service from TeleCrossing
is 384 Kbps down, 128 Kbps up, priced at
about $40 in most places---it will vary from
market to market.

The company also provides T1 connections
to business at competitive rates—Wahba
mentions a range of $300 to $700. We're
betting that won't be competitive for long.

And it can provide very high-speed
connections—up to 155 Mbps if the
demand is there—using single-channel
point-to-point satellite links.

Seeking partners
TeleCrossing is looking for ISP partners to
help it distribute the service across the
country, although Wahba admits that some
details of how it will work with service
providers have yet to be worked out.

"We have contacted a lot of ISPs," he says.
"We wanted to understand the market first.
We were ready to talk, but we have not
deployed [the service through an ISP] yet."

The first ISP partners could be operational
within a month, though, he says. Some
negotiations are down to "legalese."

The company has been operating

experimental systems from seven POPs in the northeast—in Connecticut, New York City, New York state, and New Jersey—with about 350 customers up and running.

Technical strategy

It's currently using half a transponder on GE-5, a General Electric-owned satellite that covers North America. In terms of data throughput, this provides about 15 Mb.

TeleCrossing also experimented successfully with other satellite services, including birds that give it global reach. And it can buy more satellite capacity with a phone call, Wahba says.

"That's really the beauty of our system in comparison to others who want to be in this business—I won't name any names. They put satellites in the sky and hope they sell the customers. For us, demand comes first. As we pick up the customers we go and get the bandwidth."

TeleCrossing uses satellite base stations in each market and then distributes bandwidth to end customers using frequency-hopping spread spectrum wireless technology operating in the unlicensed 2.4GHz band.

The company has experimented with a number of radio equipment vendors including Nokia and WaveLAN. Cisco is also a major supplier of wireless equipment.

Growth projections

TeleCrossing expects to deploy 200 fixed wireless distribution points by August 2001, 800 by the end of 2002. It's not clear how many satellite base stations this involves, and the company is guarded about where it will deploy first.

Financing so far is all internal—"call it family money," Wahba says. The company recently finalized a new business plan, however, and is now actively talking to outside investors. He will consider going public if the market remains favorable, Wahba says.

Exploring partnership arrangements

How might TeleCrossing work with an ISP? First, the company will supply all the radio and satellite network infrastructure itself. It

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is considering a number of possible
business models.

Most will involve the ISP buying or leasing
gateway equipment worth between $10,000
and $15,000—although Wahba notes that if
an ISP can deliver a large enough
guaranteed customer base, his company will
consider covering these costs as well.

And it will consider models that involve the
ISP collecting revenues directly from the
customer and paying a fee based on
bandwidth used, or TeleCrossing billing the
customer and sharing revenues with the ISP.

As always in these columns, we're not
advocating TeleCrossing over other
wireless alternatives for ISPs. Indeed, the
company's legacy of failure in the DTH
market is no great recommendation.

But the end-to-end wireless concept is at
least intriguing and it sounds like
TeleCrossing is nothing if not flexible in its
approach to dealing with ISPs. We figure
it's at least worth a look-see.

—End

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Wednesday June 6, 7:33 am Eastern Time

Press Release

AlphaStar Provides Direct Backbone Connectivity Via Satellite Broadband to ISP'S, Fixed Wireless Operators, Cable TV, Rural Telco's, Office Buildings, Corporations and Other Commercial Users

GREENWICH, Conn.--(BUSINESS WIRE)--June 6, 2001--AlphaStar International is providing satellite broadband access direct to commercial and institutional users as part of the service offerings by www.alphastar.com

The service is called SkyCrossing Direct and it provides access directly from satellites to dishes mounted at the user's premises. SkyCrossing provides ``Broadband Backbone in The Sky'' based on the innovative and affordable technology of Bandwidth-On-Demand (``BOD''), rather than the traditional and expensive Single Channel Per Carrier technology (``SCPC''). SkyCrossing provides an ``Always On'' two-way satellite broadband connection with speeds up to 33 Mbps and beyond.

The SkyCrossing Direct Service:

> targets geographical areas that are unserved and underserved by terrestrial networks. SkyCrossing connects the unconnected,

> provides redundancy and back up to primary fiber connections in areas where landlines are available. SkyCrossing protects the connected,

> avoids the congested terrestrial network and the landline local loop,

> allows for deployed within days with maximum flexibility and minimum cost.

Many broadband providers find themselves between a rock and a hard place - dependent on their competitors for backbone connectivity. The result, as witnessed during the last few months is that both the broadband providers and their customers suffer. SkyCrossing provides the answer by bypassing fiber and phone companies entirely, from the first mile to the last mile. SkyCrossing provides full service solutions to corporations, office buildings, MDU's, government agencies, non-profit organizations, educational institutions, fixed wireless and MMDS operators, cable TV MSO's, rural Telco'S, ISP's and ASP's among others.

SkyCrossing is available within the footprint of General Electric Americom satellite GE-5 and GE-6 covering the USA, Canada, Latin America and the Caribbean. Later this summer the service will include Europe, the Middle East and Africa. SkyCrossing can cover the entire globe with one satellite hop.

SkyCrossing pricing is both fair and innovative. Most satellite data carriers today offer prices based on SCPC technology and the customers pay for bandwidth whether they use it or not. This is waste of satellite bandwidth and money. SkyCrossing pricing is based on the new BOD technology that prices on actual use only. Why pay for a whole loaf, when you only need a slice? And why should an average user subsidize a heavy user?

SkyCrossing Direct basic packages start at speeds up to 512 kbps downstream and 128kbps upstream with an allotment of 2GB per month for $299 per month. Customer pays incrementally, per one MB for any bandwidth use in excess of the monthly allotment. Other packages with higher data rates and volumes are also available. Service packages and prices are posted at: www.skycrossing.net.

SkyCrossing's mission is to be the most innovative and least cost satellite broadband provider. In August 2000, SkyCrossing deployed an innovative residential 2-way satellite broadband service. SkyCrossing is expanding its residential service by deploying in five additional markets. The residential service is based on a hybrid model integrating satellite broadband as a backbone and fixed wireless as the final mile. SkyCrossing residential service is priced at $49.99 per month with speeds up to 512 kbps downstream/144 kbps upstream.

SkyCrossing is the lowest cost satellite broadband provider today with the lowest risk. Recent news reports indicate that many of the projects announced to provide satellite broadband sometime in the future and requiring billions of dollars to deploy and operate, are having difficulty finding financial sponsors. SkyCrossing does not believe in the notion that `` when you build it, they will come". SkyCrossing's system is designed to minimize risk, as costs are rather low and incremental by design, therefore customer demand precedes capital expenditures, and operating costs. Furthermore, SkyCrossing is providing satellite broadband service today, not years in the future.

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Monday June 5, 7:33 am Eastern Time

Company Press Release

AlphaStar Demonstrate A Broadband Network Integrating Two-way Satellite with Cisco Wireless Technology

ATLANTA--(BUSINESS WIRE)--June 5, 2000--AlphaStar International. (
www.alphastar.com)

(Greenwich, CT) announced the successful completion of a demonstration of an Internet
Broadband network integrating two-way satellite and wireless local access. The demonstration
integrated AlphaStar's two-way satellite global coverage with Cisco System's wireless
technology.

Last month, AlphaStar announced the deployment of a high speed Internet and intranet
broadband network called **www.alphastar.com** TeleCrossing Introduced a hybrid technology
integrating for the first time two-way satellite global coverage with a network of wireless local
access hubs. TeleCrossing provides Internet broadband access that is always on, dedicated and
fully interactive with high speed up to 32 Mbps in an increment or fraction of 2 Mbps,
symmetrical or asymmetrical.

TeleCrossing began deployment and marketing in selective residential and business markets. By
the end of the year 2000 the company will deploy 400 wireless local hubs and connect them all
together via satellite as one network. According to Mahmoud Wahba, president and founder of
TeleCrossing. ``The pace of deployment will accelerate dramatically in the following years and
will include a major global expansion." Wahba states further, ``The services will be price
competitive with DSL and Cable modem for both business and residential Internet users. In some
markets the monthly fees will start as low as $29.95 without additional payments for local
Internet access." All the subscriber needs is a radio antenna connected by a small modem to
desktop computers, laptops, set-top boxes, printers, fax machines or scanners. All high-speed
broadband applications will be available including streaming, multimedia and video on demand
(VOD). Wahba states, ``The company is seeking strategic partners to offer the services via
handheld and mobile computing and entertainment devices."

Integrating satellites with wireless local access has many advantages. The network covers both
global and local geographical areas anywhere. It originates, aggregates and distributes both
global and local content at truly high speed uploading and downloading. TeleCrossing can be
deployed quickly with flexibility and affordability. The all-wireless network allows mobility of
Internet access and the use of computing and entertainment handheld devices for future growth.

TeleCrossing bypasses the congested terrestrial backbone and the phone carriers entirely. The network offers a dedicated private and secure line to each Internet user. Additionally, for intranet and business users, TeleCrossing offers several configurations of Virtual Private Network (VPN) that can be encrypted and completely secured by the use of conditional access. Two-way-satellite uses a small dish at the wireless local hub to send and receive broadband content without the need for the phone line for a return path. TeleCrossing eliminates the need for a residential satellite dish on the roof or the ground of the subscriber's home. As a result the network can be installed at the subscriber's home easily and requires little or no maintenance (Say goodbye to the residential satellite dish everywhere!)

TeleCrossing offers an immediate and more reliable alternative to cable modem and DSL in urban, suburban and rural markets. TeleCrossing marketing objectives are to target Internet and intranet users who are a) unserved, b) underserved, c) dissatisfied with cable or DSL services or, d) the disenfranchised who fall in the digital divide. Cable penetrates only 64% of American households while DSL can only reach one third of internet users due to distance limitations. TeleCrossing can reach geographically remote areas or areas that are rendered virtually remote due to the lack or insufficiency of fiber and cable network, whether these be urban, suburban and rural areas. For example, many of the suburbs of New York City are rendered virtually remote because of the weakness of the fiber or cable infrastructure. Try to get DSL in parts of Greenwich, CT or use cable after 6 pm in Scarsdale NY, or Fort Lee, NJ. Some of the Internet users in well-served markets are concerned with sharing bandwidth with their neighbors and the possible breach of security or privacy when they use cable modem. DSL users, on the other hand, are concerned with the complexity of wire installation, the entanglement with the phone companies and speed fluctuations and unpredictability. At the other extreme, a recent study showed that in the USA, there are 12 states that are at the risk of falling behind the rest of the country due to the lack of fiber hubs for broadband access. They were named the ``Disconnected Dozen." They include the states of Alabama, Arkansas, Idaho, Iowa, Maine, Montana, New Hampshire, North Dakota, Oklahoma, South Dakota, West Virginia and Wyoming. Most countries of the world lack a terrestrial backbone and cannot deploy it. TeleCrossing can provide an immediate and economical broadband solution to these ``disconnected" markets both in the USA and globally.

About AlphaStar International

AlphaStar is one of the original four Direct-To-Home (DTH) satellite television broadcasting companies, including DirecTV, Echo Star, PrimeStar and AlphaStar. The company now specializes in Internet and intranet Broadband content origination, aggregation, multimedia data storage, streaming media services and distribution via both fiber and satellite live 24/7 or on demand.

AlphaStar's teleport, located in Oxford, Connecticut, on twelve acres is one of only a dozen Ku-band facilities in the world specializing in video and multimedia with extensive capacity and scalability. (For a view go to tour our teleport, www.telecrossing.net.) The teleport allows the Downlinking and Uplinking of satellite feeds using Ku, C bands and Vsat connections and the reception via a small dish. Additionally, the teleport is connected by 24 dark fibers to the terrestrial backbone of the Internet allowing the delivery of multiple terabit and beyond. The

teleport has been fully licensed by the FCC since 1996. The teleport cannot be replicated without spending tens of millions of dollars and considerable time to obtain zoning permits and construction, creating an immediate barrier to entry. Built on a mountaintop as part of President Reagan's ``Star Wars'' program, it was intended originally to protect the US by tracking the former Soviet Union's satellites. As a result the teleport is geographically located where it can downlink and uplink satellite feeds from most countries around the globe. The Teleport is capable of broadcasting and streaming tens of thousands of TV and multimedia channels and providing all teleport services and Internet broadband applications.

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www.alphastar.com

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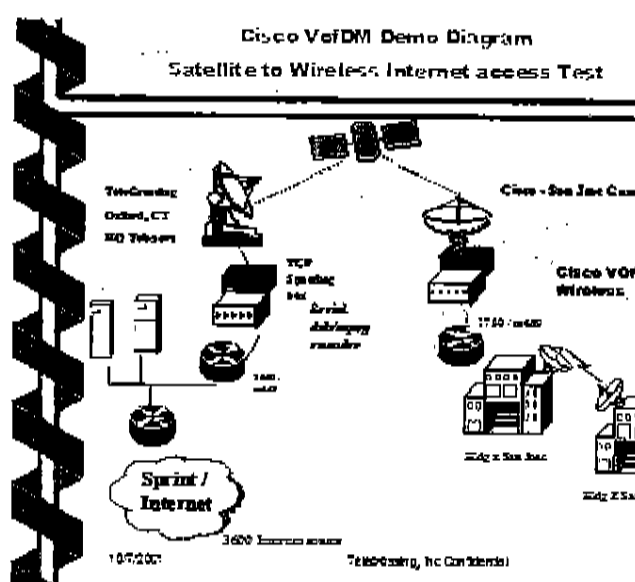m aw
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